Supreme Court, U.S.
FILED
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No. 03-429

In The

SUPREME COURT of the UNITED STATES

MARGARET O'CONNOR,

Petitioner,

v.

PAMELA S. PREDICK, et vir., et al.

Respondents.

REPLY TO BRIEF IN OPPOSITION

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PARTIES

The Petitioner is Margaret O'Connor, the Defendant in the circuit court, the Appellant in the Wisconsin Court of Appeals, and the Petitioner in the Wisconsin Supreme Court.

The Respondents are Pamela S. P. and George P., the Plaintiffs in the circuit court, the Respondents in the Wisconsin Court of Appeals, and the Respondents in the Wisconsin Supreme Court.

The Respondent is Tina M. Busch, the Petitioner in the circuit court, the Respondent in the Wisconsin Court of Appeals, and the Respondent in the Wisconsin Supreme Court.

I. RESPONDENTS HAVE DECIDED TO ENGAGE IN MINOR REVISION OF THE JANUARY 9, 2002 COURT ORDER TO AID THEM IN DEVELOPING A SEEMINGLY RATIONALE FOUNDATION FOR THIS COURT TO DENY PETITIONER'S WRIT OF CERTIORARI.

The Respondents have willfully interchanged words to manipulate this Court into the belief that Petitioner has an option to re-enter Walworth County, and even the possibility of visiting her Mother's home, if Petitioner would get adequate professional counseling (stated concisely). The grim reality is that the circuit court has made available to Petitioner only that it "may consider" her re-entry into Walworth County so that she may associate with her Mother and family at the home she was raised in, even after making a reasonable effort of engaging herself in the time and expense of professional counseling. The universal definition of "may" is *possible*. Whereas, the definition of the words the Respondents used to

interchange with "may" were "will" and "would", have universal futuristic *certainty*. Petitioner invites review of the January 9, 2002 court order which is included in the Appendix of Petitioner's Petition for Writ of Certiorari. The Respondents' scheme to influence this Honorable Court with what Petitioner may only presume, is that they had hoped that they would be able to guise a minor court consideration and use it as a more weighty component stemming from the court order, so that it somehow would be construed by this Court as a purge condition or a court mandated condition, nonetheless, a deplorable and indefensible act in all respects.

II. RESPONDENTS' REFERENCE TO PAGE NUMBERS FROM PETITIONER'S WISCONSIN APPELLATE BRIEF ONLY, DOES NOT DO AN ADEQUATE JOB IN CONCEALING THE FACT THAT A FEDERAL RIGHT OF ASSOCIATION CLAIM WAS FAIRLY STATED TO THE WISCONSIN STATE COURTS.

Respondents act as though they are ignorant of the federal right of association claim stated by Petitioner in pages 9-13 in her Wisconsin Supreme Court Petition For Review. By-passing the contents of this brief and then alluding to the fact that the decision was one page when no reason for denial was given by the Wisconsin Supreme Court, which is typically the case, does not make good sense in persuading this Honorable Court to buy into the assumption that this claim was not timely, nor fairly presented. The depth and directness of the presentation of this federal claim found in Petitioner's Petition For Review negates against the argument that

it must be presented independently as a central issue to be addressed or understood by the Wisconsin Supreme Court. Petitioner invites review of the Wisconsin Supreme Court Order filed on April 22, 2003, which is included in the Appendix of Petitioner's Petition for Writ of Certiorari.

CONCLUSION

Petitioner has in only four pages been able to point out to this Honorable Court that the seemingly rationale foundation denying Petitioner's Writ of Certiorari is buckling under. Petitioner has now established a showing of preliminary defeat in merit of two of the questions presented in Respondents' Brief in Opposition by simply referring to previous documentation that has already circulated through the Wisconsin state courts, and Petitioner remains positive in her outlook that soon, all significant

documentation in this case will be able to be disposed upon this Honorable Court for review in their entirety.

For all of the foregoing reasons, the Petition for Writ of Certiorari should be, in all respects, granted.

Dated this 27 day of October, 2003.

Respectfully submitted,

By: Margaret O'Connor
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